

Sedgwick

MEMORANDUM ENDORSED

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MEMORANDUM ENDORSED

May 26, 2011

Via Hand Delivery

Hon. Louis L. Stanton, U.S.D.J.
United States District Court For The
Southern District Of New York
500 Pearl Street
New York, NY 10007

USDC SDNY
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Re: *Marie Tamara Thomas v. The Hartford Life Insurance Company of America, et al.*
Civ. Act. No. 11-cv-1490(LS)
SDMA File No. 02489-000122


Dear Judge Stanton:

This office represents the defendants in the above-referenced matter. We write to respectfully request an extension of one week to file and serve our Reply in further support of the defendants' Motion to Dismiss the Plaintiff's Complaint.

Recently, defendants filed a Motion to Dismiss the plaintiff's Complaint in this matter and, in response, plaintiff submitted opposition papers. The Defendants must submit their Reply papers no later than March 26, 2011. However, the parties are currently discussing a mutually agreeable resolution of the defendants' Motion to Dismiss and have agreed that a one week extension of the defendants' time to submit Reply papers is necessary to provide sufficient time for the parties to draft the documents that will resolve their dispute, while also preserving the defendants' right to submit Reply papers if an agreement does not materialize. Specifically, this request will provide the plaintiff with sufficient time to draft an amended complaint, as well as a stipulation amending the caption, which will most likely resolve the Motion to Dismiss and thus, allow the defendants to withdraw their motion. Accordingly, the parties respectfully request that this Court adjourn the defendants' time to file its Reply from May 26, 2011 to June 2, 2011. This is the first request for an extension concerning the defendants' Reply in further support of their Motion to Dismiss and it is made on the consent of all parties.

Thank you for your consideration of this matter.

Respectfully submitted,


Michael H. Bernstein
Sedgwick LLP

MHB

NY/701354v1

So
ordered
Louis
L. Stanton
5/26/11

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cc: *Via Regular Mail*

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